

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI**

IN RE:

LINDA L. BRANNEKY

CASE NO.: 14-40052  
CHAPTER 7

LINDA L. BRANNEKY,  
*Plaintiff,*

v.

Adv. Proc. No.: 14-04100

UNITED STATES DEPARTMENT OF EDUCATION  
DEPARTMENT OF EDUCATION BUILDING  
400 MARYLAND AVE SW  
WASHINGTON DC 20202  
*Defendant.*

**AMENDED COMPLAINT TO DETERMINE DISCHARGEABILITY  
OF DEBT**

COMES NOW, PLAINTIFF DEBTOR, and state as follows:

1. Plaintiff is the DEBTOR in this case.
2. This Court has jurisdiction under 11 U.S.C. Section 523(a) and 28 U.S.C. Section 1334. This adversary proceeding relates to the above-captioned case under Chapter 7 of the Bankruptcy Code now pending in this Court. This is a core proceeding under 28 U.S.C. Section 157(b)(2)(I).
3. On April 08, 2014, an order was made herein granting to Plaintiff DEBTOR a discharge in bankruptcy, and said order has now become final.
4. In the schedules of debts in this proceeding, Plaintiff DEBTOR listed as a creditor Fed Loan Servicing, ACS-Bank of America, and AES/MOHELA.
5. As of the date of filing of the Debtor's bankruptcy, January 6, 2014, the principal amount of the debt was approximately \$28093
6. The debt will never be paid, and will continue to grow forever.
7. At the time of filing of the original bankruptcy, the Debtor was

working part-time as an associate at Lowe's Store, and carrying for a child with Down's Syndrome.

8. Considering the Debtor's past and present future financial resources, and those that she can reasonably rely on for the future, the Debtor cannot maintain a minimal standard of living.

***WHEREFORE***, Plaintiff requests that this Court determine and order that the debt of Plaintiff DEBTOR to Defendant CREDITOR is dischargeable by virtue of the order of discharge previously granted by this Court.

Respectfully Submitted

\_\_\_\_\_/s/ M. Dwight Robbins\_\_\_\_\_  
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